

**HANSKI PARTNERS LLC**

85 DELANCEY STREET  
NEW YORK, NEW YORK 10002  
PHONE: 212.248.7400  
FAX: 212.248.5600

May 6, 2024

Via ECF

The Honorable Katherine Polk Failla  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

*Re: Motion to Extend the Parties' Time to File a Proposed Case Management Plan  
Terrell Thomas v. Duane Ventures, Inc., et al.; 1:23-cv-07113 (KPF)*

Dear Judge Failla:

Hanski Partners LLC represents the plaintiff in the above-entitled action. We write to respectfully ask the Court to extend the parties' time to file a proposed Case Management Plan and Scheduling Order from today, May 6, 2024, to May 10, 2024. We apologize for this last-minute request, but the undersigned only noticed this evening that the Court's deadline did not migrate to his new calendaring system. Consequently, we did not previously circulate a proposed Case Management Plan and Scheduling Order to defendants for their review and comments. This evening, after realizing the oversight, a proposed Case Management Plan was circulated to defendants. Consequently, an extension of time, to May 10, 2024, should be sufficient time for the parties to meet and confer on the proposed Case Management Plan and file the document by the enlarged deadline.

Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/  
Robert G. Hanski, Esq.

Application GRANTED. The Clerk of Court is directed to terminate the pending motion at docket entry 39.

Dated: May 7, 2024 SO ORDERED.  
New York, New York

*Katherine Polk Failla*

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE